

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

NORTHFIELD INSURANCE  
COMPANY,

Plaintiff

vs.

JVA DEICING, INC., JOSEPH TUZZE,  
CARGILL, INCORPORATED, and  
CAROL DONAHUE, individually and  
as Administratrix of the Estate of Mark  
Donahue, deceased,

Defendants

No. 3:23-cv-00461-MCC

(Magistrate Judge Carlson)

Electronically Filed

**UNOPPOSED MOTION OF DEFENDANTS, JVA DEICING, INC. AND  
JOSEPH TUZZE, FOR ENLARGEMENT OF TIME OF THIRTY (30)  
DAYS TO FILE ITS RESPONSE TO PLAINTIFF'S COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants,  
JVA DEICING, INC. and JOSEPH TUZZE (together the “JVA Defendants”), by  
and through their attorneys, Rosenn, Jenkins & Greenwald, LLP, hereby move this  
Honorable Court for an enlargement of time of thirty (30) days, until May 10, 2023,  
to file their response to Plaintiff’s Complaint (Doc. 1) and, in support thereof, avers  
as follows:

1. On or about March 15, 2023, Plaintiff, NORTHFIELD INSURANCE  
COMPANY (“Northfield” or “Plaintiff”), filed a Complaint against the JVA  
Defendants, CARGILL INCORPORATED, and CAROL DONAHUE, individually

and as Administratrix of the Estate of Mark Donahue, deceased, seeking Declaratory Relief. (Doc. 1).

2. The JVA Defendants were served with the Summons and Complaint on or about March 20, 2023, making their response to the Complaint due on April 10, 2023. (Docs. 6-7).

3. Counsel for the JVA Defendants require further time to compose their response to the Complaint, and therefore respectfully request a thirty (30) day enlargement of its time, to Wednesday, May 10, 2023, to respond to the Complaint.

4. The instant Motion is made in good faith and not for purposes of delay.

5. Counsel for Northfield, Amy C. Gross, Esquire was contacted and represented that she consents to the requested thirty (30) day extension.

WHEREFORE, Defendants, JVA DEICING, INC. and JOSEPH TUZZE, respectfully request that the Court grant it an extension of time until May 10, 2023 to file its response to Northfield's Complaint.

RESPECTFULLY SUBMITTED:

ROSENN, JENKINS & GREENWALD, LLP

BY: /S/ ROBERT L. GAWLAS, ESQUIRE

ROBERT D. SCHaub, ESQUIRE

Attorney I.D. No. 42466

ROBERT L. GAWLAS, ESQUIRE

Attorney I.D. No. 323299

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Attorneys for Defendants,  
JVA DEICING, INC. and JOSEPH TUZZE

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**CERTIFICATE OF CONCURRENCE**

I, ROBERT L. GAWLAS, ESQUIRE, hereby certify that counsel for Plaintiff,  
NORTHFIELD INSURANCE COMPANY concurs in the instant Motion for  
Enlargement of Time.

BY: /S/ ROBERT L. GAWLAS, ESQUIRE  
ROBERT L. GAWLAS, ESQUIRE

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**CERTIFICATE OF SERVICE**

ROBERT L. GAWLAS, ESQUIRE, hereby certifies that on the 3rd day of April, 2023, he caused to be served a true and correct copy of the foregoing UNOPPOSED MOTION OF DEFENDANTS, JVA DEICING, INC. AND JOSEPH TUZZE, FOR ENLARGEMENT OF TIME OF THIRTY (30) DAYS TO FILE ITS RESPONSE TO PLAINTIFF'S COMPLAINT, by ECF to all counsel of record.

BY: /S/ ROBERT L. GAWLAS, ESQUIRE  
ROBERT L. GAWLAS, ESQUIRE